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September 5, 2007

The Honorable Gregory M. Sleet  
U.S. District Court for the District of Delaware  
844 North King Street  
Wilmington, DE 19801

**RE: NAVARRO V. COONS, ET AL.  
C.A. No. 05-565(GMS)**

Dear Chief Judge Sleet:

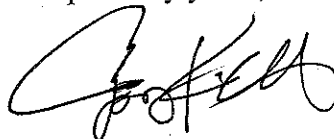
I write in response to County counsels' letter to Your Honor advising the Court that the County's attorneys, Megan Sanfrancesco and Judith Hildick, filed entries of appearances for Defendants Coons and Sapp in their individual capacities. As noted in the letter, Plaintiff Navarro objects to these late entries.

At the outset of this lawsuit, it was apparent that the County believed that they could not fairly and adequately represent both the County and the individual defendants. The County thereupon engaged Jeffrey S. Goddess, Esquire as a private attorney for the representation of Messrs. Coons and Sapp. While the County was dismissed as a party as a result of Your Honor's ruling on Defendants' Motion for Summary Judgment, this ruling is subject to appeal which could raise the very same issues of dual representation faced by the County when the County initially retained Mr. Goddess to represent Messrs. Coons and Sapp. Because the County still may have some involvement in the case, we believe that it is inappropriate to allow the County attorneys to come in at this point and represent clients who were not previously represented by the County.

Mr. Goddess has been actively engaged in representing the individual Defendants from the very beginning of this matter. Consequently, County counsels' proffered reasons for the entry of their appearances are without merit.

We are available at the Court's call.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'J. K. Martin', with a stylized, cursive script.

JEFFREY K. MARTIN

JKM:njj